

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION, :
 : 19 Civ. 9439 (PKC)
Plaintiff, :
 : **ECF Case**
-against- : **Electronically Filed**
 :
TELEGRAM GROUP INC. and TON ISSUER :
INC., :
 :
 :
Defendants. :
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DECLARATION OF ALEXANDER C. DRYLEWSKI

I, Alexander C. Drylewski, declare under penalty of perjury that the following is true and correct:

1. I am a member of Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for the Defendants in the above captioned action. I am an attorney duly admitted to practice before this Court.

2. I respectfully submit this declaration in support of the Defendants' Response in Opposition to Plaintiff's Emergency Application for Preliminary Injunction and to transmit true and correct copies of the following documents:

Exhibit A: October 16, 2019 email from Alexander C. Drylewski to Jorge Tenreiro and Kevin McGrath at the United States Securities and Exchange Commission ("Plaintiff" or "SEC"), attaching a Stipulation and Proposed Order.

Exhibit B: October 16, 2019 email from Jorge Tenreiro to Alexander C. Drylewski, attaching a subpoena (attached hereto as part of Exhibit C) and a Proposed Preliminary Injunction.

Exhibit C: Subpoenas sent on behalf of the SEC to Defendants on October 11, 2019 and October 16, 2019.

Exhibit D: Proposed Order.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on: New York, New York
October 16, 2019



Alexander C. Drylewski